

ORIGINAL



EX PARTE OR LATE FILED

2002

October 23, 2002

**NOTICE OF EX PARTE  
PRESENTATION**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW B204  
Washington, DC 20554

Re: **Federal-State Joint Board on Universal Service**  
CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200,  
95-200.95-1 16.98-170 and NSD File No. L-00-72

Dear Ms. Dortch:

The attached ~~written~~ *Ex Parte* Presentation concerning the above-referenced proceeding ~~was~~ sent to the Honorable Michael K. Powell, by the undersigned on October 23, 2002, on behalf of Palmetto Rural Telephone Cooperative. In accordance with FCC Rule 1.1206(b)(1)<sup>1</sup>, this Notice of *Ex Parte* Presentation and a copy of the referenced *Ex Parte* Presentation are being **filed** with you electronically for inclusion in the public record. Should you have any questions, please contact me at 843-538-2020.

Sincerely,

**H.J. Daodridge III**  
General Manager

cc: Commissioner Kathleen Q. Abemathy  
Commissioner Michael Copps  
Commissioner Kevin Martin

File of Ex Parte  
Presentations

<sup>1</sup> 47 C.F.R. § 1.1206(b)(1).

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**EX PARTE PRESENTATION**

Honorable Michael K. Powell  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 8B201  
Washington, DC 20554

**Re: Federal-State Joint Board on Universal Service,**  
CC Docket Nos. 96-45, 98-171, 90-571, 92-237,  
99-200, 95-200, 95-116, 98-170 and NSD File No. L-00-72;

Dear Chairman Powell:

I write to **you** on behalf of Palmetto Rural Telephone Cooperative to indicate support for the interim universal service contribution methodology proposed by the United States Telecom Association (USTA). Palmetto Rural Telephone Cooperative believes that adoption of the interim methodology will best ensure that sufficient universal **support** will continue to be available to eligible carriers. Palmetto Rural Telephone Cooperative urges the Federal Communications Commission (FCC) to continue to examine the creation of a long-term contribution methodology while the industry operates under the interim methodology.

The interim methodology should be based on interstate end-user revenues **as** a contribution base. The FCC should use a "collect and remit" system. Under this system carriers would remit payments based on the application of the **USAC** percentage to the interstate ~~retail~~ revenues actually collected. The FCC should ~~mise~~ the "safe harbor" contribution limit for wireless providers to 20-28 percent unless the wireless provider **can** determine its actual interstate retail revenue, and the safe ~~harbor~~ percentage should be applied to wireless providers on a company-wide basis. Competitive ~~local~~ exchange carriers (CLECs) should impute an amount **equal** to the subscriber line charge (SLC) assessed by the incumbent local exchange carrier (ILEC) in a CLEC's service area. CLECs should be provided with the option of reporting the imputation based on the **actual** SLC amount assessed by the ILEC **or** an amount equal to the nationwide SLC cap. All broadband and broadband service **providers** should contribute to universal service support on an equivalent basis. Finally, the FCC should impose a cap on the recovery of administrative, billing and overhead costs that contributors to universal service support programs are allowed to include in the universal service charge collected on customers' bills.

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Honorable Michael K. Powell  
**October 23, 2002**  
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The interim contribution methodology is not a substitute for the principles and long-term connection-based proposal presented by USTA in its comments and reply comments filed in this proceeding on April 22, 2002, and **May 13, 2002**, respectively. It is necessary, though, in order to allow the FCC more time to address the **administrative and legal concerns** related to the methodologies currently under review.

Sincerely,

A handwritten signature in black ink, appearing to read "H.J. Dandridge III", with a stylized flourish at the end.

**H.J. Dandridge III**  
General Manager

cc: Commissioner Kathleen Q. Abemathy  
Commissioner Michael Copps  
Commissioner Kevin Martin